





11 Park Place, Suite 1601, New York, NY 10007 | Tel. 212 402 4100 | Fax 212 402 4199

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**MEMO ENDORSED**

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VIA CM/ECF

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, New York 10007

April 13, 2023

Re: *Gumbs v. Stanford*, 22-cv-04659 (VEC)(GWG)

Dear Judge Caproni:

We represent Petitioner Secunda Gumbs in the above-referenced matter. Judge Gorenstein issued a Report and Recommendation on April 12, 2023, ECF Dkt. 15, to which we plan to file objections pursuant to Federal Rule of Civil Procedure 72(b)(2). Those objections are currently due on April 26, 2023, as ordered by Judge Gorenstein.

Pursuant to Rule 2(C) of Your Honor's Practices in Civil Cases, we respectfully request a four-week extension of the deadline, such that any objections will be due by May 24, 2023. This is Petitioner's first request for an extension of this deadline. We request this extension due to the obligations faced by each of Petitioner's attorneys in their other matters. Petitioner's original counsel at Orrick, Herrington, & Sutcliffe LLP is no longer available and has been substituted with new counsel from the firm who is familiarizing herself with the case. Petitioner's counsel at the Office of the Appellate Defender, the undersigned, is responsible for significant supervisory duties in this office.

Respondent consents to this request, on the understanding that any extension will apply to all parties.

Thank you for your consideration in this matter.

Respectfully submitted,

/s/David Bernstein  
David Bernstein  
Attorney for Petitioner

Deputy Attorney in Charge  
Office of the Appellate Defender

*Cc:*

Alyssa Barnard-Yanni, Orrick, Herrington, & Sutcliffe LLP  
David Cohen, Bronx County District Attorney's Office

Application GRANTED. Petitioner's deadline to file any objections to the R&R is **May 24, 2023**;  
Respondent's deadline to file any response is **June 7, 2023**.

SO ORDERED.



Date: 4/14/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE